

SouthEast Telephone

February 20, 2009

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street
Washington, D.C. 20554

**RE: Developing a Unified Inter-carrier Compensation Regime, CC Docket
No. 01-92; Establishing Just and Reasonable Rates for Local Exchange
Carriers, WC Docket No. 07-135**

Dear Ms. Dortch:

SouthEast Telephone supports the joint proposal of AT&T Services, Inc. and the Rural Independent Competitive Alliance ("RICA"), submitted on November 25, 2008. SouthEast Telephone agrees with the aforementioned parties, that a limited, carefully tailored set of rules will provide an effective compromise to address the issue of traffic pumping.

SouthEast recognizes the need to address the problems created by companies unethically "gaming" the system, but feels that the actions of a few should not unduly burden those carriers entitled to claim the "rural exemption." The proposal filed by AT&T and RICA is narrowly crafted to address the problem created by those companies who employ revenue sharing arrangements, while not harming carriers engaged in legitimate business arrangements.

In summary, SouthEast Telephone supports the AT&T/RICA proposal which retains the rural exemption while capping the carrier's interstate minutes of use ("MOU") to a feasible 15,000 mou per month, per working loop. The proposal, if accepted, would limit the likelihood of arbitrage by traffic pumping carriers, while insuring the continued availability of the rural exemption for carriers competing in good faith.

Sincerely,



Bethany Bowersock
In-House Counsel
SouthEast Telephone, Inc.